

Office of the Chapter 13 Standing Trustee

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April 16, 2019

The Honorable Andrew B. Altenburg, Jr.
United States Bankruptcy Court
P.O. Box 2067
Camden, New Jersey 08102

**RE: Chapter 13 Bankruptcy
Case No. 15-31092 (ABA)
Debtor(s) Name: Amr M. Selim**

Dear Judge Altenburg:

Please accept this letter as a limited objection to Debtor's Motion to Approve Sale of Real Estate which is returnable Tuesday, May 14, 2019 at 10:00 a.m.

Debtor comes before the Court forty-one (41) months after his case was filed on a Motion to Approve Sale of 424-426 E. Broad Street, Millville, New Jersey. Debtor has obtained a Contract of Sale for \$170,000. After deducting the cost of sale and balances due the numerous judgment liens listed in Debtor's motion, the proceeds from sale will total approximately \$86,226.04. The proposed Order claims proceeds in the amount of \$11,037.50 as exempt. A review of Schedule C of Debtor's Bankruptcy Petition reveals that Debtor does not have any exemptions available. As a result, all of the proceeds are non-exempt.

Based on the foregoing, the Trustee respectfully requests Debtor be required to submit an amended proposed Order to the Judge's chambers to include the following language:

All proceeds from the sale of property are non-exempt and shall be forwarded to the Chapter 13 Trustee to be distributed as an additional base to unsecured creditors who filed timely claims.

As always, the Court is welcome to contact the Trustee with any concerns.

Respectfully submitted,

/s/ Raymond H. Shockley, Jr.
Raymond H. Shockley, Jr.
Staff Attorney

RHS/jpa
cc: Subranni Zauber, LLC (Via ECF/CM)
Amr M. Selim (Via First Class Mail)